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7 Counsel for Defendant CASTANEDA GALLEGOS

8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA  
 10 SAN JOSE DIVISION

11 UNITED STATES OF AMERICA,	) NO. 24-MJ-71019 MAG
12 Plaintiff,	) STIPULATION TO EXCLUDE TIME; AND
13 v.	) [PROPOSED] ORDER
14 URIEL CASTANEDA GALLEGOS,	)
15 Defendant.	)
16	)

17 Currently, a preliminary hearing is scheduled for July 22, 2025. The parties are requesting that  
 18 this hearing be continued to August 14, 2025. The parties stipulate that time should be excluded under  
 19 the Speedy Trial Act from July 22, 2025, through August 14, 2025.

20 The Government has produced discovery to Defendant. The defense requires additional time to  
 21 review the discovery. Additionally, the parties are working on a resolution to this case.

22 Accordingly, the parties stipulate and agree that excluding time until August 14, 2025, will allow  
 23 for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate  
 24 and agree that the ends of justice served by excluding the time from July 22, 2025, through August 14,  
 25 2025, from computation under the Speedy Trial Act outweigh the best interests of the public and the  
 26 defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

27 The parties further stipulate and agree that, given the need to investigate matters which may bear  
 28

STIPULATION TO EXCLUDE TIME AND [PROPOSED] ORDER

v. 7/10/2018

1 on the disposition in the case, good cause exists for extending the time limits for a preliminary hearing  
2 under Federal Rule of Criminal Procedure 5.1(d), and defense counsel accordingly consents on behalf of  
3 the defendant to extending the time limit for the preliminary hearing. The parties further stipulate and  
4 agree to an extension of time for the 30-day time period of an indictment under the Speedy Trial Act.

5 IT IS SO STIPULATED.

6  
7 DATED: July 17, 2025

8 /s/  
NEAL C. HONG  
Assistant United States Attorney

9 /s/  
10 SOPHIA WHITING  
Counsel for Defendant

~~[PROPOSED]~~ ORDER

Based upon the facts set forth in the stipulation of the parties, the Court continues the preliminary hearing scheduled for July 22, 2025, to August 14, 2025, and excludes time under the Speedy Trial Act. The Court finds that failing to exclude the time from July 22, 2025, through August 14, 2025, would unreasonably deny defense counsel and the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv).

The Court further finds that the ends of justice served by excluding the time from July 22, 2025, through August 14, 2025, from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial.

Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time from July 22, 2025, through August 14, 2025, shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

The Court further finds good cause exists for extending the time limits for a preliminary hearing under Federal Rule of Criminal Procedure 5.1 and for extending the 30-day time period for an indictment under the Speedy Trial Act. *See* Fed. R. Crim. P. 5.1; 18 U.S.C. § 3161(b).

IT IS SO ORDERED.

DATED: July 17, 2025

  
HON. VIRGINIA K. DEMARCHI  
United States Magistrate Judge